

UNITED STATE DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

2005 MAR -9 A 8:35

Albert William Bleau Jr.

Plaintiff

vs.

Greater Lynn Mental Health  
& Retardation Association, et al,

Defendants

Civil Action  
No. 04 – 10469REK

**MOTION REQUESTING RELIEF TO PREVENT CONTINUING  
RETALIATION AND DEFAMATION BY THE DEFENDANTS**

The plaintiff moves that the Court order the defendants to cease and desist from defaming and retaliating against the defendant and that they submit for the court's approval a written statement that will be used by the defendants for any requests for information concerning the plaintiff requested by prospective and present clients and employers.

Plaintiff, Albert W. Bleau Jr., submitted a Motion Regarding Production of Documents & A Written Reference for the Plaintiff & Delay to File Rico Documentation on January 18, 2005 that was denied by the Court without Prejudice. The plaintiff has also submitted a motion for summary judgment on March 8, 2005 and a motion to deny defendants' motions to dismiss, for summary judgment and for entry of separate and final judgment.

Should the Court deny the plaintiff's motion for summary judgment, the plaintiff will require the documents requested in his January 18, 2005 motion.

### **MEMORANDUM**

The Court denied Plaintiff's motion for a reference letter from the defendants.

However, some sort of written documentation is necessary to circumvent the continued retaliation and defamation by the defendants and others who they have given defaming information about the plaintiff.

The plaintiff has reason to believe that the defendants their clients and business associates and others to whom they have given defaming information have continued to interfere with plaintiff's business relationships and his ability to gain permanent employment not only in Massachusetts but in other New England States as well.

In the summer of 2003, at the same time that the plaintiff was applying for his job at the GLMHRA, the plaintiff applied for two non-profit Executive Director positions in the state of Maine and was not granted an interview for either position.

The plaintiff's resume and qualifications were attached to his January 18, 2005 motion to the court and clearly demonstrate that he was qualified and should have been granted interviews for these positions and for hundreds of other positions for which he has applied during the past three years.

When the plaintiff talked to the Human Resource Manager of Kennebec Valley Human Services he was told, " You better get your story straightened out

with GLMHRA as to why you left the company because if they are telling everyone what they and people told me, no one is going to hire you for anything”.

The defendants, their employees and their agents must be refrained from stating that the plaintiff was terminated for cause, that he stole the retirement money, that he is under investigation, or that he misappropriated state funds, that he was a drug addict, or that he was an alcoholic, that he was unable to perform his duties.

They should state that the plaintiff was the Executive Director of GLMHRA from April 1974 to September 2000, that during his leadership the agency's operating budget grew from \$12,000 annually to over 30 Million dollars and that all programs were properly licensed and met the highest quality assurance standards required by the funding agencies: The Department of Mental Health and The Department of Mental Retardation.

That he continued as the Executive Director of EMHC after leaving GLMHRA; that he founded EMHC in 1978 growing the company to over four million dollars in annual operating revenue and purchasing and renovating over seventy properties with assets of over 29 Million dollars, and that he resigned from this position in November 2000 to go into private business.



## *Kennebec Valley Mental Health Center*

67 Eustis Parkway — Waterville, Maine 04901-4901  
(207) 873-2136 • 1-888-322-2136 • Fax (207) 872-4522

Web Site: [www.kvmhc.org](http://www.kvmhc.org)

THOMAS J. McADAM  
Chief Operating Officer  
Interim Chief Executive Officer

email: [tmcadam@kvmhc.org](mailto:tmcadam@kvmhc.org)

July 31, 2003

24 Columbia Street  
Swampscott, MA 01907

Dear Albert W. Bleau, Jr.:

On behalf of the CEO search committee, I regret to inform you that your qualifications did not match our needs.

Thank you for your interest in Kennebec Valley Mental Health Center.

Sincerely,

Diane Sheehey  
Chair, Search Committee



Mark J. Matluck  
Program Director  
Executive Service Corps  
87 Summer Street  
Boston, MA 02110  
Phone: (617) 357-0849  
Fax: (617) 423-2510  
[mmatluck@escne.org](mailto:mmatluck@escne.org)

[www.opnocsne.org](http://www.opnocsne.org)

## Management

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Organization: Kennebec Valley Mental Health Center

Title: Chief Executive Officer

Description: Chief Executive Officer For a Central Maine Behavioral Health Organization. Kennebec Valley Mental Health Center, a nonprofit organization, offers comprehensive community behavioral health services throughout central Maine. The administrative office is in Waterville, a city that offers easy convenience to Route 95, two colleges, cultural and recreational activities and close proximity to mountains, lakes, and the coast. The successful candidate will work with a management team to oversee the operations of an expanding behavioral health agency that currently employs over 150 staff. Qualified applicants must have a demonstrated ability to forge alliances and collaborate with other health or social service agencies and pursue strategic planning and business development. A master's degree in human services, health, business or a related field and a minimum of five years progressively responsible managerial experience, preferably in a health or human service agency, is necessary. A demonstrated ability to advocate for the mentally ill and experience with a multi-structured organization are pluses. Applications must be received by **July 1, 2003**. An Equal Opportunity Employer.

1. leadership skills
2. alliances
3. strategic planning
4. Advocate for mentally ill
5. Multi-structured organization

Contact: To apply, please send resume and salary requirements to: Chair, Search Committee, Kennebec Valley Mental Health Center, 67 Eustis Parkway, Waterville, Maine 04901; [searchchair@KVMHC.org](mailto:searchchair@KVMHC.org).

Date Posted: 05/29/03

Organization: National Conference for Community and Justice (NCCJ)

Title: Executive Director - Rhode Island & SE New England

Description: The National Conference for Community and Justice (NCCJ), founded as The National Conference of Christians and Jews, is a nationwide human relations organization dedicated to fighting bias, bigotry, and racism in America through advocacy, conflict resolution, and education. We are seeking an Executive Director of our Rhode Island & SE New England located in Providence to provide strong leadership over the programmatic, fund development and communications efforts to advance our mission in the community. The